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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

ROBERT WOLFE,

Defendant.

2:13-mj-000776-VCF

**Stipulation to Continue Preliminary
Hearing (Ninth Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G.

Bogden, United States Attorney, and Cristina D. Silva and Crane M. Pomerantz, Assistant United States Attorneys, counsel for the United States of America, and Louis Schneider, Esq., counsel for defendant Robert Wolfe, that the preliminary hearing date in the above-captioned matter, currently scheduled for January 20, 2014, at 4:00 pm, be vacated and continued for thirty (30) days, to a date and time to be set by this Honorable Court.

This stipulation is entered into for the following reasons:

1. The parties have met, and, on several occasions, conferred regarding this case. The parties believe they have successfully negotiated this case. Defense counsel would like time to complete his review of discovery and confer with his client to finalize a plea. By allowing more time, the Defendant may enter a plea, which will alleviate the need for an indictment to be

1 filed, or for the case to proceed to trial.

2 2. The parties agree to the continuance.

3 3. The defendant is not incarcerated and does not object to the continuance.

4 4. Additionally, denial of this request for continuance could result in a
5 miscarriage of justice.

6 5. The additional time requested herein is not sought for purposes of delay, but
7 to allow for the case be resolved via a pre-indictment plea.

8 6. The additional time requested by this stipulation, is allowed, with the
9 defendant's consent under the Federal Rules of Procedure 5.1(d).

10 DATED this 20th day of January, 2015.

11 Respectfully submitted,
12 DANIEL G. BOGDEN
13 United States Attorney

14 //s//

//s//

15 LOUIS SCHNEIDER, ESQ.
16 Counsel for Defendant -
17 ROBERT WOLFE

18 CRANE M. POMERANTZ
19 Assistant United States Attorney
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6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**
8 **-oOo-**

9 UNITED STATES OF AMERICA,)

10 Plaintiff,)

11 vs.)

12 ROBERT WOLFE,)

13 Defendant.)
14 _____)

2:13-mj-00776-VCF

FINDINGS OF FACT AND ORDER

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16 **FINDINGS OF FACT**

17 Based on the pending Stipulation of counsel, and good cause appearing therefore,
18 the Court finds that:

19 1. The parties have met, and, on several occasions, conferred regarding this
20 case. The parties believe they have successfully negotiated this case. Defense counsel would like
21 time to complete his review of discovery and confer with his client. By allowing more time, the
22 Defendant may enter a plea, which will alleviate the need for an indictment to be filed, or for the
23 case to proceed to trial.

24 2. The parties agree to the continuance.

25 3. The defendant is not incarcerated and does not object to the continuance.

26 4. Additionally, denial of this request for continuance could result in a

ORDER

IT IS THEREFORE ORDERED that the preliminary hearing currently scheduled for January, 2014, at the hour of 4:00 pm, be vacated and continued to February 20, 2015 at the hour of 4:00 pm in courtroom 3D.

DATED 20th day of January, 2015.



THE HONORABLE CAM FERENBACH
UNITED STATES MAGISTRATE JUDGE